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March 1, 2021

BY ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearle Street
New York, New York 10007

Re: United States v. Stephen Bannon, 20 Cr. 412 (AT)

Dear Judge Torres,

We are in receipt of the Court's scheduling order (Docket entry 87), for Stephen Bannon's motion to dismiss the Indictment as it pertains to him. We will of course adhere to that schedule with respect to the Motion to Dismiss.

My letter of February 18, 2021 made an additional request for the exoneration of Mr. Bannon's bail and bail conditions. The Government has consented to that request while it was opposing the request to dismiss the Indictment.

I would respectfully ask the Court to act on the bail exoneration request. Mr. Bannon and his bail co-signors should not have to wait for the resolution of the motion to dismiss to have the lien lifted and the co-signors freed of their obligations. This Court should also direct the return of Mr. Bannon's property, such as passports and electronic devices that the United States Attorney isn't holding for evidentiary purposes.

Respectfully submitted

/s/ Robert J. Costello
Counsel for Stephen Bannon

RJC
cc: AUSA Nicolas Roos